

PRIVACY INFORMATION NOTICE

in accordance with Article 13 and 14 of the GDPR General Data Protection Regulation (EU) 2016/679

1. Controller and / or Joint Controllers of the processing of personal data

The Companies of the SACE perimeter, hereinafter indicated, process, according to the specific purposes pursued and indicated in this information, your personal data independently or jointly in accordance with the European Regulation 2016/679 (hereafter GDPR):

- **SACE S.p.A.** with registered office in Rome, piazza Poli n. 37/42 (00187), tax code and VAT number 05804521002
- **SIMEST S.p.A.** with registered office in Roma, Corso Vittorio Emanuele II n. 323 (00186), tax code and VAT number 04102891001
- **SACE Fct S.p.A.** with registered office in Milano, via San Marco n. 21/A, (20121), tax code and VAT number 06560010966
- **SACE BT S.p.A.** with registered office in Roma, piazza Poli n. 37 (00187), tax code and VAT number 08040071006
- **SACE SRV S.r.l.** with registered office in Roma, piazza Poli n. 42 (00187), tax code and VAT number 09629971004

The aforementioned Companies act as independent Data Controllers for the purposes set out in paragraph 3). They may also act as Joint Controllers in relation to the processing of data for marketing purposes as specified in paragraph 4) having jointly determined the purposes and means of processing through the conclusion of a specific agreement pursuant to art. 26 of the GDPR.

The Joint Controllers in order to facilitate relations between you and each Data Controller have appointed a Data Protection Officer (DPO) who can be contacted by writing to the email address privacy@sace.it.

2. Sources and type of data processed

Personal data processed by the aforementioned Data Controllers are collected directly from customers, also through the use of remote communication techniques (such as the website and the web services contained therein), or by third parties such as, for example, Public and Public Administrations Registers, Chambers of Commerce, Databases of Private Companies. In the event that the Data Controllers acquire data from external companies for the purposes of commercial information, market research, direct offers of products and services, an information will be provided at the time of registration of the data or, in any case, no later than the first possible communication.

The data processed by the Data Controllers may include personal information (name, surname, date of birth, address, image, gender, marital status, social security number, etc.) and contact information. Moreover, in the fulfillment of specific obligations related to the management of the relationship (such as for example mandatory communications to the Authorities), as well as during communications by the customer, it may happen that the data subject deal with particular categories of data ex art. 9 GDPR and judicial data pursuant to art. 10 of the GDPR.

With regard to the activities carried out by SACE SRV (the Company of the perimeter SACE specialized in commercial information and debt collection) as Data Controller, also on the basis of

a special Prefectural Authorization (pursuant to Article 134 of the Consolidated Law of Public Security), collects and processes both personal data provided directly by data subjects , and some personal data from public registers, lists and archives or contained in acts or documents that can be known by anyone (held, for example, by Chambers of Commerce or at the Inland Revenue) or in any case generally accessible (as derived, for example, from categorical lists, press reports and internet sites that can be consulted by anyone).

SACE SRV can acquire information regarding organizational, production, industrial, commercial, economic, financial, property, administrative and accounting aspects related to the activity carried out by economic operators (such as individual or family businesses, small entrepreneurs, professionals, exponents relevant companies, etc.), and data referring to natural persons who do not exercise a business or professional activity (in the commercial information are also included data relating, for example, to company records, financial statements, protests and insolvency proceedings, prejudicial to conservative, hypocatastal data, as well as any judicial data reported in public sources or generally accessible by anyone).

In the cases strictly required by the Code of Deontology and good conduct for the processing of personal data for commercial information purposes (approved by the Authority for the protection of personal data, with Resolution of 17/09/2015, No. 479, and published on the GU n.238 dated 13/10/2015), SACE SRV as Data Controller may process data relating to criminal convictions and offenses (Article 10 of the Regulation) from public sources or, under certain circumstances, even from generally accessible sources .

3. Purposes of data processing and its legal basis carried out by the Data Controllers

Each Data Controller, except for specific cases of joint controllership as indicated below, may request the provision of his personal data for the purposes of process indicated below:

- a) Purposes strictly related and instrumental to the establishment and management of relationships with customers (eg: acquisition of preliminary information to the conclusion of a contract, execution of operations on the basis of obligations arising from contracts concluded with customers, etc.) pursuant to art. 6 paragraph 1 lett. b) GDPR. For the aforementioned purposes your personal data will be processed by the Companies of SACE perimeter and communicated to third parties;
- b) Purposes deriving from legal obligations, regulations, community legislation, provisions issued by authorities legitimated by the law or by supervisory and control bodies (pursuant to Article 6 paragraph 1 letter c) GDPR. The provision of personal data for the purposes referred to in points a) and b) is necessary to perfect, implement or continue the contractual relationship with the Data Controllers.

SACE SRV, as Data Controller, will be able to provide the third parties who request it (its customers) with commercial information services that are used to assess the activities, solidity and economic and commercial capacity of a person and to carry out checks in the context of any commercial relationships in progress or to be established (which, in the absence of correct and complete information, could remain precluded) and to protection of the relative rights. Commercial information may also be requested by SACE SRV customers, also in the form of lists (by sectors or categories), for marketing activities, telephone contacts and postal communications for commercial, promotional and advertising purposes (in compliance with the obligation to disclose information and the prohibition imposed by the regulations in force for the use of automated systems, such as e-mails, faxes, pre-recorded telephone messages and SMS messages, in the absence of prior consent from the interested parties).

The personal data acquired by SACE SRV may also be subject of further analysis or statistical processing, both in an automated form and through the intervention of experts, in order to attribute an assessment or judgment also synthetic or in the form of scoring on the degree of reliability solvency or economic and commercial capacity of the undertaking or person concerned and / or the probability of insolvency of an enterprise, taking into account, for example, its overall economic, financial and capital situation, as well as previous and current receivables and payables , also in

reference to subjects with responsibility or relevant positions. The processing of data, for the purposes of commercial information described above, even when finalized to formulate, in the terms already specified, a judgment on the solidity, solvency and reliability of the subject registered, is based on the need to pursue the legitimate interests of SACE SRV which provides the services of commercial information and of the clients requesting them both to carry out the necessary checks on the economic, financial and assets situation of the interested parties, in the context of protection, prior to the establishment and management of commercial relationships, even pre-contractual, to the supply of goods, performances and services and to the definition of the relative payment terms and conditions, and to the fulfillment of the related regulatory obligations, including anti-money laundering, the prevention and contrast of fraud and the protection of related rights, including in court.

It is understood that such processing will be carried out in full compliance with the Code of conduct and good conduct for the processing of personal data and, once adopted by the Controller, of the Code of Conduct or applicable law and in compliance with the interests and rights and freedoms of the Data Subject, pursuant to art. 6, paragraph 1, lett. f), of the Regulation.

4. Treatments carried out under the Joint Controllers arrangement

The Joint Controllers, as identified in paragraph 1 of this Privacy Information Notice, entered into a Joint Controller arrangement pursuant to Article 26 of the Regulation. The Data Controllers, through the aforementioned arrangement, intend to process jointly the data collected in the exercise of their activities for marketing purposes. Specifically, these activities concern:

- sending advertising material, direct sales, carrying out market research and commercial communication
- quality detection also through automated remote communication techniques (such as email, text messages, instant messaging) and traditional (as operator calls)

The provision of data for marketing purposes is voluntary and the related processing is subject to the legitimacy of consent. In case of lack of consent, the processing will not allow the promotion activity indicated, but it will not prejudice in any case, the Data Subject.

For the aforementioned purposes, the Joint Controllers have also jointly determined the methods of processing within the specific arrangement and have defined, in a clear and transparent manner, the procedures for providing the person concerned with a timely response if they wish to exercise their rights, so as provided for in articles 15, 16, 17, 18 and 21 of the Regulation and in the cases of portability of Personal Data provided for in Article 20 of the Regulation.

The Joint Controllers have appointed SACE S.p.A. as the external Data Processor in relation to the supply activity of Information Services including the management and maintenance of the Customer Relationship Management ("CRM").

5. Modality of data process

In relation to the aforementioned purposes, processing of personal data takes place through manual, computerized and telematic tools with logic strictly related to the purposes themselves and, in any case, in order to guarantee the security and confidentiality of the data.

6. Retention of personal data

Your Personal Data will be kept only for the time necessary for the purposes for which they are collected in compliance with the principle of minimization ex art. 5.1.c) GDPR and, with reference to the promotional and marketing purposes until the revocation of the consent to the processing. The Data Controllers may keep some data even after the termination of the relationship,

depending on the time needed to manage specific contractual or legal obligations as well as for administrative, tax and / or contributory purposes, period of time imposed by laws and regulations in force , as well as for the time necessary to assert any rights in court. In any case, the data are processed well as in compliance with current legislation, according to the rules of confidentiality, inherent in the performance of the financial activity, to which the Data Controllers have always been inspired.

SACE SRV, as regards its business, keeps the information coming from public sources and related to negative events for the provision of commercial information services, in compliance with the following time limits:

- information relating to bankruptcy or bankruptcy proceedings, for a period of time not exceeding 10 years from the date on which the bankruptcy procedure was opened; after this period, the aforementioned information may be further used by our Company, only when other information relating to a subsequent bankruptcy or if a new bankruptcy or insolvency procedure has been initiated referring to the person being registered or to another related party, in which case, the treatment may last for up to 10 years from their respective openings;
- information relating to prejudicial and hypocatastal acts (mortgages and foreclosures) for a period of time not exceeding 10 years from the date of their registration or registration, unless they are canceled before that date, in which case it will be kept for a period the period of 2 years the annotation of the cancellation.

Without prejudice to the foregoing, personal data from the sources identified in paragraph 2 above may be retained by SACE SRV, for the purpose of providing customers with commercial information services, for the period of time in which they remain known and/or published in such sources, in accordance with the provisions of the respective relevant regulations.

7. Categories of subjects to whom the data can be communicated

The Data Controllers may communicate your personal data to third parties, and to Cassa depositi e prestiti for the purposes referred to in paragraph 3), letter a) and b) without the need to acquire your consent. Further communications will be possible with respect to guarantors, if relevant to the existing guarantee relationship. Your data may also be disclosed to third parties in fulfillment of legal obligations.

With your consent, the Data Controllers may communicate your personal data to third parties who will process them as Independent Data Controllers, for commercial information, statistical surveys, market research, direct offers of their products and services through traditional contact and through automated methods of contact.

These subjects will act as Independent Data Controllers or will be designated as Data Processors and are essentially included in the following categories:

- subsidiaries or associates;
- to CDP and Casa Group companies, deposits and loans;
- public or private entities that detect financial risks for the purpose of preventing the risk of insolvency provided for by law;
- subjects who perform banking, financial and insurance services, including those involved in the management of payment systems, tax collection and treasury;
- subjects that provide services for the management of the information system, including the internet site of SACE and the companies of SACE perimeter, web applications and telecommunications networks (including e-mail);
- subjects that carry out transmission, enveloping, transport and sorting communications with customers;
- subjects that carry out archiving and retention activities, including IT, of documentation relating to relations with customers;

- debt collection company;
- individuals, companies, associations or professional firms that provide services or assistance and consultancy to the companies of the SACE perimeter, with particular but not exclusive reference to accounting, administrative, legal, tax and financial matters;
- subjects that perform control, auditing and certification of the activities carried out by the companies of the SACE perimeter also in the customers' interests.

8. Transfer of Personal Data to extra EU

Any transfer of data to third countries outside the EU for the purposes indicated in the above points 3 and 4 may take place, in compliance with the methods permitted by the law in force and in particular on the basis of the provisions of the GDPR of which: i) . 44 - General principle for the transfer; ii) to the art. 45 - Transfer on the basis of an adequacy decision; iii) to the art. 46 - Transfer subject to adequate safeguards; iv) art.49 - Derogations in specific situations. The data can therefore be transferred:

- to non-EU countries outside the EU or international organizations, if the European Commission has considered that these countries or organizations guarantee an adequate level of protection (Article 45 of the GDPR)
- to non-EU countries outside the EU or international organizations that have provided adequate safeguards (for example the adoption of Standard Clauses approved by the European Commission) on the condition that the interested party has rights to action and effective remedies - (Article 46 of the GDPR)
- towards non-EU third countries or international organizations, on the basis of binding corporate rules (Binding Corporate Rules - BCR) for companies belonging to the same business group (Article 47 of the GDPR)
- towards Third Countries or international organizations, on the basis of the derogation provided for the recurrence of the conditions set forth in art. 49 and in particular those referred to in paragraph 1, letter: b) execution of a contract; c) conclusion or execution of a contract between the Data Controller and any other natural or legal person in the interest of the data subject. Further information can be acquired upon explicit request addressed to the Data Controller to the contacts indicated in point 1 above.

9. Rights of the Data Subject

We inform you, finally, that the articles 15-22 GDPR grant to DATA Subject the opportunity to exercise specific rights; the DATA Subject can obtain from the Data Controller: access, rectification, cancellation, limitation of processing, revocation of consent and the portability of data concerning him.

The data subject also has the right to object to the processing. In the case in which the right to objects to processing is exercised, the Data Controller and / or the Joint Controllers companies reserve the right not to proceed with the request, and therefore to continue the process, in the case in which there are legitimate reasons to proceed with the process that prevail over the interests, rights and freedoms of the person concerned.

The above rights may be exercised by sending a written communication to the e-mail address privacy@sace.it and / or by writing to the Data Protection Officer at SACE S.p.A. piazza Poli, no. 37/42, 00187 - Rome or by sending a written communication to:

- **SACE BT S.p.A.** with registered office in Rome, Piazza Poli n. 37 (00187) to the attention of the Data Protection Officer or to the e-mail address privacy@sacebt.it
- **SACE Fct S.p.A.** with registered office in via San Marco 21 / A, 20121 Milan, to the attention of the Data Protection Manager or to the e-mail address privacy@sacefct.it

- **SACE SRV S.r.l.** with registered office in Rome, Piazza Poli n. 42 (00187), to the attention of the Data Protection Officer or to the e-mail address privacy@sacesrv.it
- **SIMEST S.p.A.** with registered office in Corso Vittorio Emanuele II 323, 00186 Rome, to the attention of the Data Protection Officer or to the e-mail address privacy@simest.it

The Data Subject also may exercise his or her right to the Personal Data Protection Authority.

CONSENT TO THE PROCESSING OF PERSONAL DATA

The undersigned

_____ ,
on the basis of the informations received from SACE S.p.A. and from the companies of the SACE perimeter referred to art. 13 and 14 of the 2016/679 European Regulation on privacy (GDPR) as Controller and / or Joint Controllers pursuant to Article 26 of the Regulation :

– with regard to the processing of personal data relating to marketing activities (sending of advertising material, direct sales, carrying out market research and commercial communication) and quality detection also through automated remote communication techniques (such as email, sms, instant messaging) and traditional (as operator calls) of SACE and the companies in the perimeter.

gives consent or denies consent

– with regard to the communication of your personal data to third-party companies for the purposes of commercial information, statistical surveys, market research, direct offers of their products and services carried out through traditional methods of contact and through automated methods of contact

gives consent or denies consent

Signature Date _____

The consent given may be revoked at any time by writing to the following e-mail addresses:
privacy@sace.it, privacy@sacebt.it, privacy@sacefct.it, privacy@sacesrv.it, privacy@simest.it.